Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In The Matter of	)	
	)	
	)	MB Docket No. 87-268
Advanced Television Systems and	)	
Their Impact Upon the Existing	)	
Television Broadcast Service	)	

PETITION FOR RECONSIDERATION

Woods Communications Corporation (Woods), by its attorney, requests reconsideration of the Commission's Seventh Report and Order and Eighth Further Notice of Proposal Rule Making, FCC 07-138, released August 6, 2007.[1] ("Report and Order") In support, Woods respectfully submits the following:

BACKGROUND

Woods is the licensee of WCOV-TV, Facility Id. No. 73642, licensed to Montgomery, Alabama. It is licensed to operate on Channel 20. Pursuant to its filing of February 9, 2005, FCC Form 382, Woods elected to utilize Channel 16 as its DTV Channel (See Attachment A). Appendix A to the Report and Order reflects Channel 16 in the Post-Transaction DTV of Allotments (Attachment B). See also Appendix B (Attachment C).

Woods seeks reconsideration of the specification of Channel 16 as its DTV Channel. Rather, Woods requests a change in the table of allotments to specify DTV operation on Channel 20, which is the current NTSC Channel of operation for WCOV-TV.

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1 Publication in the Federal Register occurred on September 26, 2007, 72 Fed Reg. No. 186, pgs. 54719 – 54773.

ARGUMENT

Attached to the instant submission is an Engineering Statement of Woods' consulting engineer, Jeremy D. Ruck. (Attachment D). Mr. Ruck states, inter alia, the following:

> "The Proposed Change in Channel from 16 to 20 for DTV operations at WCOV does not violate either the current 2.0 percent interference standards or the 0.5 percent standard."

Predicated on his studies which are included in the Engineering Statement, Mr. Ruck concludes:

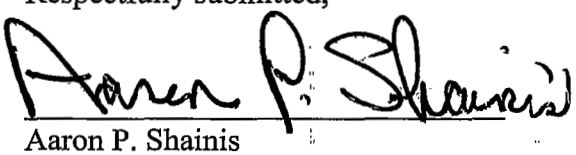
> "... the proposed facility would not cause more than 0.4 percent interference to any facility listed in the post-transition table of allotments. In addition none of the facilities considered would receive interference to 10 percent or greater of its service population either inclusive or exclusive of WCOV-DT. The proposed change in the allotment for WCOV-DT from Channel 16 to Channel 20 would therefore comply with current Commission Rules and with expected changes to Commission Rules limiting interference to O.5 percent.

Woods has realized that it is not economically prudent to fully build-out DTV Channel 16. For example, it can utilize its existing Channel 20 antenna for DTV operation. Its prior decision to build-out Channel 16 for DTV operation was made without fully understanding the full financial implications of that decision.

CONCLUSION

In light of the fact that there would be no impact to any other licensee, it is urged that the Commission grant reconsideration and allow Woods to utilize Channels as its post transition DTV Channel.

Respectfully submitted,



Aaron P. Shainis
Counsel for
Woods Communications Corporation

ATTACHMENT A

Federal Communications Commission

CLIENT COPY

FCC MB - CDBS Electronic Filing
Account number: 435982

Description: WCOV ELECTION FORM
Application Reference Number: 20050209AKM
Successfully filed at Feb 9 2005 3:03PM

Menu

Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-1076 (October 2004)	FOR FCC USE ONLY
FCC 382		
DIGITAL CHANNEL ELECTION FORM **FIRST ROUND ELECTION** **Must Be Filed by February 10, 2005** Please Read INSTRUCTIONS Before Completing This Form		FOR COMMISSION USE ONLY FILE NO. -

Section I - General Information

Licensee/Permittee Information

1. Legal Name of the Licensee/Permittee
WOODS COMMUNICATIONS CORPORATION

Mailing Address
ONE WCOV AVENUE

City	State or Country (if foreign address)	ZIP Code
MONTGOMERY	AL	36111 -

Telephone Number (include area code)	E-Mail Address (if available)
3342887020	DWOODS@WCOV.COM

Station / Facility Information

2. FCC Registration Number

Call Sign	Facility ID Number
WCOV-TV	73642

Community of License: City	State
MONTGOMERY	AL

3. **Currently Assigned Channels:**

a. DTV Channel: 16 ☐ Not Applicable

b. NTSC Channel: 20 ☐ Not Applicable

Contact Information (if different from licensee/permittee)

4. Contact Representative
AARON P. SHAINIS

Firm or Company Name
SHAINIS & PELTZMAN, CHARTERED

Mailing Address
1850 M. ST, NW
SUITE 240

City	State or Country (if foreign address)	ZIP Code
WASHINGTON	DC	20036 -

Telephone Number (include area code)	E-Mail Address (if available)
2022930011	AARON@S-PLAW.COM

Purpose of Form:

5. The purpose of the channel election process is for television broadcast licensees and permittees to select an in-core channel (i.e., channels 2-51) for their post-transition DTV operation. The purpose of the First Round Election Form is for all licensees/permittees currently assigned at least one in-core channel to make a channel election. **(SELECT ONE)**

a. ◉ Channel Election
b. ○ Amendment

Section II - CHANNEL ELECTION

All broadcast television licensees and permittees participating in the digital channel election process are required to file a channel election form. Licensees/Permittees that do not submit a channel election form by the deadline on page one will be assigned a channel by the Commission for post-transition DTV operation.

First Round Channel Election:

1.	**Channel Election: (SELECT ONE)**		
	a. ◉	Licensee/permittee makes the following channel election from its currently assigned (DTV or NTSC) channels NOTE: Post-transition rights to other in-core channel(s) currently assigned to the licensee/permittee for this station are released upon licensee/permittee receipt of a Commission tentative channel designation.	Indicate in-core channel number for final DTV operation here. 16
	b. ○	Licensee/permitteee has entered into a Negotiated Channel Election Arrangement and, accordingly, makes the following channel election, subject to Commission approval: **Licensee/permittee must complete Schedule A.** If the Commission does not approve licensee/permittee's negotiated channel election arrangement, licensee/permittee makes the following channel election from its currently assigned (DTV or NTSC) channels: NOTE: Post-transition rights to other in-core channel(s) currently assigned to the licensee/permittee for this station are released upon licensee/permittee receipt of a Commission tentative channel designation.	Indicate in-core channel number for final DTV operation here. Indicate alternate in-core channel number for final DTV operation here.
	c. ○	Licensee/permittee makes no channel election; accordingly, licensee/permittee elects to participate in the second round of elections. This option may be selected only by licensees/permittees with only one in-core channel or with two low VHF channels (2-6). NOTE: Post-transition rights to in-core channel(s) currently assigned to the licensee/permittee for this station are released.	
International Coordination.			
2	Is the licensee/permittee electing a channel that is subject to a pending international coordination issue? If yes, licensee/permittee must attach an explanation as an Exhibit to this form.		○ Yes ◉ No [Exhibit 1]

Section III

I certify that the statements in this form are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this election form. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing DAVID WOODS	Typed or Printed Title of Person Signing PRESIDENT
Signature	Date 2/9/2005

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

ATTACHMENT B

APPENDIX A

RULE CHANGES
(POST-TRANSITION DTV TABLE OF ALLOTMENTS)[1]

Part 73 of the Commission's Rules and Regulations (Chapter I of title 47 of the Code of Federal Regulations) is amended as follows:

PART 73 -- RADIO BROADCAST SERVICES

1. The authority citation for Part 73 continues to read as follows:

Authority: 47 U.S.C. 154, 303, 334, 336 and 339.

2. Section 73.622 is amended by adding new paragraph (i) to read as follows:

§ 73.622 Digital television table of allotments.

* * * * *

(i) Post-Transition Table of DTV Allotments.

ALABAMA

Community	Channel No.
Anniston	9
Bessemer	18
Birmingham	*10, 13, 30, 36, 50
Demopolis	*19
Dothan	21, 36
Dozier	*10
Florence	14, 20, *22
Gadsden	26, 45
Gulf Shores	25
Homewood	28
Huntsville	19, *24, 32, 41, 49
Louisville	*44
Mobile	9, 15, 20, 23, 27, *41
Montgomery	12, 16, *27, 32, 46
Mount Cheaha	*7
Opelika	47
Ozark	33
Selma	29, 42
Troy	48
Tuscaloosa	23, 33
Tuskegee	22

[1] Note: Changes from proposed post-transition DTV Table of Allotments are in bold.

ATTACHMENT C

APPENDIX B

PROPOSED DTV TABLE OF ALLOTMENTS INFORMATION

The table in this appendix presents the Commission's assignments of DTV channel allotments to individual broadcast television stations for post-transition DTV operations. It sets forth the technical facilities – effective radiated power, antenna height above average terrain, and antenna identification code – and transmitter site for which each TV station would be authorized on its post-transition channel. The table also provides information on stations' predicted service coverage and the percentage of their service population that would be affected by interference received from other DTV stations. The channels here are the same as those the Commission is including in the new DTV Table of Allotments (DTV Table), codified in Section 73.622(i) of the rules (*see* Appendix A.).

The table includes a DTV channel assignment for all television stations that are eligible under the qualifying criteria, set forth in the *Second DTV Periodic Report and Order* and reiterated in the discussion above. The technical facilities parameters, which were also used for calculation of the tabulated engineering information, were developed in the three-round channel election process that the Commission conducted to create the proposed DTV Table, in some cases modified in response to comments filed in this proceeding. These technical facilities data are also available in an EXCEL format at http://www.fcc.gov/dtv.

Data Elements

Facility ID: A five-digit code for identification of TV or DTV stations associated with channel allotments. A unique code is assigned to each station at the time the Commission first receives an application for a construction permit for that station and does not change, even where the license for the station changes ownership or major changes are made to the station, such as a change of channel or community.

City and State: The city and state to which the channel is allotted and the station is licensed to serve.

NTSC Channel: The station's current analog (NTSC) channel. This field is left blank in the case of stations that are only licensed to operate digital television service. If a station currently operates only an analog channel, that analog channel will appear in this field. Note: Stations must cease analog operations at the end of the DTV transition on February 17, 2009. *See* 47 U.S.C. § 309(j)(14)(A).

DTV Channel: The channel assigned for the station's post-transition DTV operation.

DTV Power: The effective radiated power (ERP) for the station's post-transition DTV operation. This value is the ERP specified for the station's post-transition operation in the channel election process or modified in response to comments in this proceeding. Accordingly, the ERP may be the station's: (1) currently authorized ERP, (2) 1997 service replication ERP, (3) other allowable value to which it agreed to operate to resolve a conflict or as part of a negotiated agreement in the channel election process; or (4) in cases where a station's assigned DTV channel is not its current DTV channel, a value determined by the Commission that will enable the station to provide coverage of the station's service area as specified in the channel election process. The value shown is the maximum, over a set of uniformly spaced compass directions, of the ERP values used in determining the station's specified noise-limited DTV service contour. This value is used in the calculations of service and interference also shown herein.

In cases where the TV Engineering Database indicated employment of a directional antenna, the ERP in each specific direction was determined through linear interpolation of the relative field values describing the directional pattern. (The directional pattern stored in the FCC computer database provides relative

field values at 10 degree intervals and may include additional values in special directions. The result of linear interpolation of these relative field values is squared and multiplied by the overall maximum ERP listed for the station in the TV Engineering Database to find the ERP in a specific direction.)

Where a station's ERP was determined by the Commission, it was calculated using the following methodology. First, the distance to the station's noise-limited DTV contour (or Grade B contour for stations that do not have a DTV channel) was determined in each of 360 uniformly spaced compass directions starting from true north. This determination was made using information in the engineering database, including directional antenna data, and using terrain elevation data at points separated by 3 arc-seconds of longitude and latitude, in conjunction with the FCC F(50,90) curves. The FCC curves (47 C.F.R. §73.699) were applied in the usual way, as described in 47 C.F.R. §73.684, to find this noise-limited contour distance, with the exception that dipole factor considerations were applied to the field strength contour specified in 47 CFR §73.683 for UHF channels.

The station's post-transition DTV ERP was then calculated by a further application of FCC curves, with noise-limited DTV coverage defined as the presence of field strengths of 28 dBu, 36 dBu, and 41 dBu as set forth in Section 73.622(e) of the rules, respectively for low-VHF, high-VHF and UHF, at 50 percent of locations and 90 percent of the time. The family of FCC propagation curves for predicting field strength at 50 percent of locations 90 percent of the time is found by the formula $F(50, 90) = F(50, 50) - [F(50, 10) - F(50, 50)]$. That is, the F(50, 90) value is lower than F(50, 50) by the same amount that F(50, 10) exceeds F(50, 50). At UHF, the precise value 41 dBu was applied for channel 38; and the value used for other UHF channels is 41 dBu plus a dipole factor modification. This results in reception on channel 14 needing 2.3 dB less, and channel 69 needing 2.3 dB more, than the 41 dBu for channel 38. The dipole factor modification used in ERP calculations is equal to 20 times $\log_{10}$ of the ratio of the center frequency of the UHF channel of interest to the center frequency of channel 38.

In general, these computations of a station's DTV power on a new channel to match the distance to its noise-limited contour result in ERP values which vary with azimuth. For example, the azimuthal ERP pattern that replicates for a UHF channel, the noise-limited contour of an omnidirectional VHF operation will be somewhat different because terrain has a different effect on propagation in the two bands. Thus, the procedure described here effectively derives a new directional antenna pattern wherever necessary for a precise match according to FCC curves.

Finally, the ERP specified for a station's new UHF DTV channel was limited so that it does not exceed 1 megawatt. This was done by scaling the azimuthal power pattern rather than by truncation. For example, if replication by FCC curves as described above requires an ERP of 1.2 megawatts, the power pattern is reduced by a factor of 1.2 in all directions. The azimuthal pattern is used in subsequent service and interference calculations for the station.

Antenna Height: The height of the station's transmitting antenna above average terrain, that is, antenna height above average terrain (antenna HAAT). In general, the antenna HAAT value shown for each station is the same as that specified for the station in the channel election process. This value represents the height of the radiation center of the station whose service area is being replicated, above terrain averaged from 3.2 to 16.1 kilometers (2 to 10 miles) from the station's transmitter site, over 8 evenly spaced radials. In computations of service coverage and interference, the value of antenna HAAT was determined every 5 degrees directly from the terrain elevation data, and by linear interpolation for compass directions in between.

Antenna ID: A six digit number that identifies the radiation pattern for the station's transmitting antenna that is stored in the Commission's Consolidated Database System (CDBS). In cases where a station's post-transition channel is the same as its currently assigned DTV channel, the station's antenna pattern is the same as its certified facilities antenna. In other cases, such as where a station chose its analog channel

or a different channel, or where the Commission's staff selected a "best available" channel for the station's post-transition operation, the antenna pattern for the station was developed by our computer software to allow the station to replicate the coverage area reached by operation at its certified facilities on its proposed channel (i.e., the station's TCD from the channel election process); or the station has indicated that it would use a particular antenna for its post-transition operation in the channel election process, the station's antenna pattern is the same as specified in Schedule B of FCC Forms 383 and 385. These antenna patterns are used in the calculation of service area and interference. The CDBS can be accessed on the Internet at www.fcc.gov/mb/cdbs.html.

Transmitter Latitude: The geographic latitude coordinates of the station's transmitter location.

Transmitter Longitude: The geographic longitude coordinates of the station's transmitter location.

Service Area, Service Population, and Percent Interference Received: Under the heading "DIGITAL TELEVISION SERVICE AFTER THE TRANSITION," prospective conditions are evaluated in terms of both area and population. The values tabulated under this heading are net values: service area is the area within a station's noise-limited service contour where the desired signal is above the DTV noise threshold, less the area where service receives predicted interference from other DTV stations. Similarly, the number of people served is the population within a station's noise-limited service contour receiving an adequate signal relative to noise excluding people in areas with predicted interference. The level of interference received to a station's service is calculated based on desired-to-undesired (D/U) ratios, and these levels must be above certain threshold values for acceptable service. The percent interference received value is the percentage of the station's service coverage within its noise-limited service contour that is affected by predicted interference from other DTV stations. The threshold values used to prepare the interference estimates in this appendix are those set forth in Section 73.623(c) of the rules, 47 C.F.R. § 73.623(c). The procedure used to identify areas of service and interference is that specified in *OET Bulletin No. 69*. See OET Bulletin No. 69, Longley-Rice Methodology for Evaluating TV Coverage and Interference, February 6, 2004 ("*OET Bulletin No. 69*"), available at www.fcc.gov/Bureaus/Engineering_Technology/Documents/bulletins/oet69/oet69.pdf.

[Note: DTV Table of Allotments Information is attached separately in Microsoft Excel format.]

and City	NTSC	DTV								
	Chan	Chan	ERP (kW)	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDDMMSS)	Area (sq km)	Population (thousand)	% Interferen Received
ANCHORAGE	5	5	45	277		612010	1493046	45353	348	
ANCHORAGE	7	8	50	240	67898	612522	1495220	26532	317	
ANCHORAGE	2	10	21	240	67943	612522	1495220	22841	317	
ANCHORAGE	13	12	41	240	65931	612522	1495220	25379	317	
ANCHORAGE	4	20	234	55	74791	611311	1495324	10885	302	
ANCHORAGE	9	26	1000	212	74792	610402	1494436	23703	323	
ANCHORAGE	11	28	28.9	61	73156	611133	1495401	7254	292	
ANCHORAGE	33	32	50	33	74793	610957	1494102	8943	287	
BETHEL	4	3	1	61		604733	1614622	10324	9	
FAIRBANKS	7	7	3.2	214	74449	645520	1474255	11355	82	
FAIRBANKS	9	9	3.2	152	80229	645442	1474638	6873	82	
FAIRBANKS	11	11	3.2	1	74991	645036	1474248	5673	82	
FAIRBANKS	2	18	16	230		645520	1474249	10344	82	
JUNEAU	3	10	1	1		581756	1342407	4249	30	
JUNEAU	8	11	0.14	1		581805	1342626	2239	30	
KETCHIKAN	4	13	3.2	1	29997	552059	1314012	4355	15	
NORTH POLE	4	20	50	5		644532	1471926	6209	82	
SITKA	13	7	3.2	1	80181	570301	1352004	6048	8	
ANNISTON	40	9	15.6	359	39744	333624	862503	24554	1437	
BESSEMER	17	18	350	675	44013	332851	872403	37533	1549	
BIRMINGHAM	10	10	3	426		332904	864825	22745	1363	
BIRMINGHAM	13	13	16.9	408	75054	332926	864748	31517	1646	
BIRMINGHAM	42	30	1000	426	43265	332904	864825	31006	1687	
BIRMINGHAM	68	36	885	406	68103	332904	864825	28264	1553	
BIRMINGHAM	6	50	1000	420	74797	332919	864758	33118	1692	
DEMOPOLIS	41	19	1000	324	60739	322145	875204	26322	330	
DOTHAN	18	21	1000	205		311425	851843	23559	436	
DOTHAN	4	36	995	573		305510	854428	43948	886	
DOZIER	2	10	3.2	393		313316	862332	23623	353	
FLORENCE	15	14	1000	431	66619	350009	870809	30337	1112	
FLORENCE	26	20	50	230	74798	343438	874657	15572	355	
FLORENCE	36	22	556	202		343441	874702	20778	544	
GADSDEN	60	26	150	315	29932	334853	862655	17744	1379	
GADSDEN	44	45	225	309	43164	335327	862813	17536	1350	

and City	NTSC	DTV								
	Chan	Chan	ERP (kW)	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDDMMSS)	Area (sq km)	Population (thousand)	% Interferenc Received
ULF SHORES	55	25	64.5	308	74787	303640	873626	15544	932	
OMEWOOD	21	28	765	427	68108	332904	864825	30801	1663	
UNTSVILLE	19	19	40.7	514		344419	863156	23609	992	
UNTSVILLE	25	24	396	340		344413	863145	27052	1092	
UNTSVILLE	31	32	468	538	67239	344412	863159	32626	1301	
UNTSVILLE	54	41	400	518	43864	344412	863159	29827	1213	
UNTSVILLE	48	49	41	552		344239	863207	22282	936	
OUISVILLE	43	44	925	262	59887	314304	852603	18777	337	
OBILE	10	9	29	381		304117	874754	34970	1203	
OBILE	15	15	510	558	74580	303640	873627	35481	1282	
OBILE	21	20	105	529	70813	303640	873627	23682	1116	
OBILE		23	337	574	75124	303645	873843	37989	1283	
OBILE	5	27	1000	581	74800	304120	874949	45411	1406	
OBILE	42	41	199	185		303933	875333	16361	912	
ONTGOMERY	12	12	24.9	507	74369	315828	860944	31615	788	
ONTGOMERY	20	16	1000	518	29552	315828	860944	37703	829	
ONTGOMERY	26	27	568	176		322255	861733	18025	549	
ONTGOMERY	32	32	199	545	75049	320830	864443	28378	579	
ONTGOMERY	45	46	500	308	28430	322413	861147	21909	641	
OUNT CHEAHA	7	7	24.1	610	80203	332907	854833	42633	2370	
PELIKA	66	47	136	539	74487	321916	844728	24321	662	
ZARK	34	33	15	151	68078	311228	853649	8868	244	
ELMA	29	29	1000	408	32810	323227	865033	26741	621	
ELMA	8	42	787	507		320858	864651	38739	722	
ROY	67	48	50	345	30182	320336	855701	14891	479	
USCALOOSA	23	23	50	266	74752	330315	873257	16640	407	
USCALOOSA	33	33	160	625	70330	332848	872550	30987	1357	
USKEGEE	22	22	100	325	74464	320336	855702	17790	532	
RKADELPHIA	9	13	7.3	320		335426	930646	22157	299	
AMDEN	49	49	68.1	175	74782	331619	924212	13417	146	
L DORADO		10	6	541	80186	330441	921341	26324	442	
L DORADO	10	27	823	582		330441	921341	43407	631	
L DORADO	43	43	206	530	74776	330441	921341	26259	446	
UREKA SPRINGS	34	34	87.1	213	75069	362630	935825	12963	442	

ATTACHMENT D

Engineering Statement

The following engineering statement and attached exhibits have been prepared for Woods Communications Corporation, licensee of television station WCOV-TV at Montgomery, Alabama, and are in support of their petition for reconsideration relative to the Commission's DTV table of allotments.

Under the Seventh Report and Order and Eighth Further Notice of Proposed Rule Making, the Commission assigned WCOV-DT channel 16 in the post-transition DTV table of allotments. The allotment for WCOV-DT indicated an ERP of 1000 kW at a center of radiation of 518 meters above average terrain utilizing antenna ID #29552. The proponent requests a change in the table of allotments to specify operation on channel 20, which is the current NTSC channel of operation for WCOV-DT. The antenna proposed is the directional pattern contained in the CDBS under antenna ID #68079. There would be no change in either the height above average terrain of the antenna or in the geographic coordinates specified in the table of allotments.

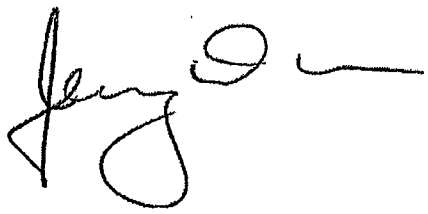
The proposed change in channel from 16 to 20 for DTV operations at WCOV does not violate either the current 2.0 percent interference standards or the proposed 0.5 percent standard. An interference study has been completed and is attached to demonstrate this conclusion. This study was performed without the benefit of masking from any other facilities in order to provide a raw total of interference caused by WCOV-DT on channel 20. The stations considered in this portion of the study are summarized in the table on the next page with parameters for each station based on information in the post-transition table of allotments.

Callsign	Channel	Location
WAPT-DT	21	Jackson, MS
WBXX-DT	20	Crossville, TN
WDHN-DT	21	Dothan, AL
WGCL-DT	19	Atlanta, GA
WHNT-DT	19	Huntsville, AL
WIIQ-DT	19	Demopolis, AL
WKPT-DT	19	Kingsport, TN
WMPN-DT	20	Jackson, MS
WMPV-DT	20	Mobile, AL
WPBA-DT	21	Atlanta, GA
WPCH-DT	20	Atlanta, GA
WUXP-DT	21	Nashville, TN
WYLE-DT	20	Florence, AL

Exhibit E-1 contains several maps illustrating the predicted areas of interference that would be caused by the change in channel by WCOV-DT from channel 16 to channel 20. The initial map (Exhibit E-1a) provides an overview of the color coded interference areas with subsequent maps illustrating more detail about the predicted areas of interference. Of the stations listed in the above table, a minor amount of interference would be caused to WDHN-DT, WIIQ-DT, WMPV-DT, WPCH-DT, and WYLE-DT.

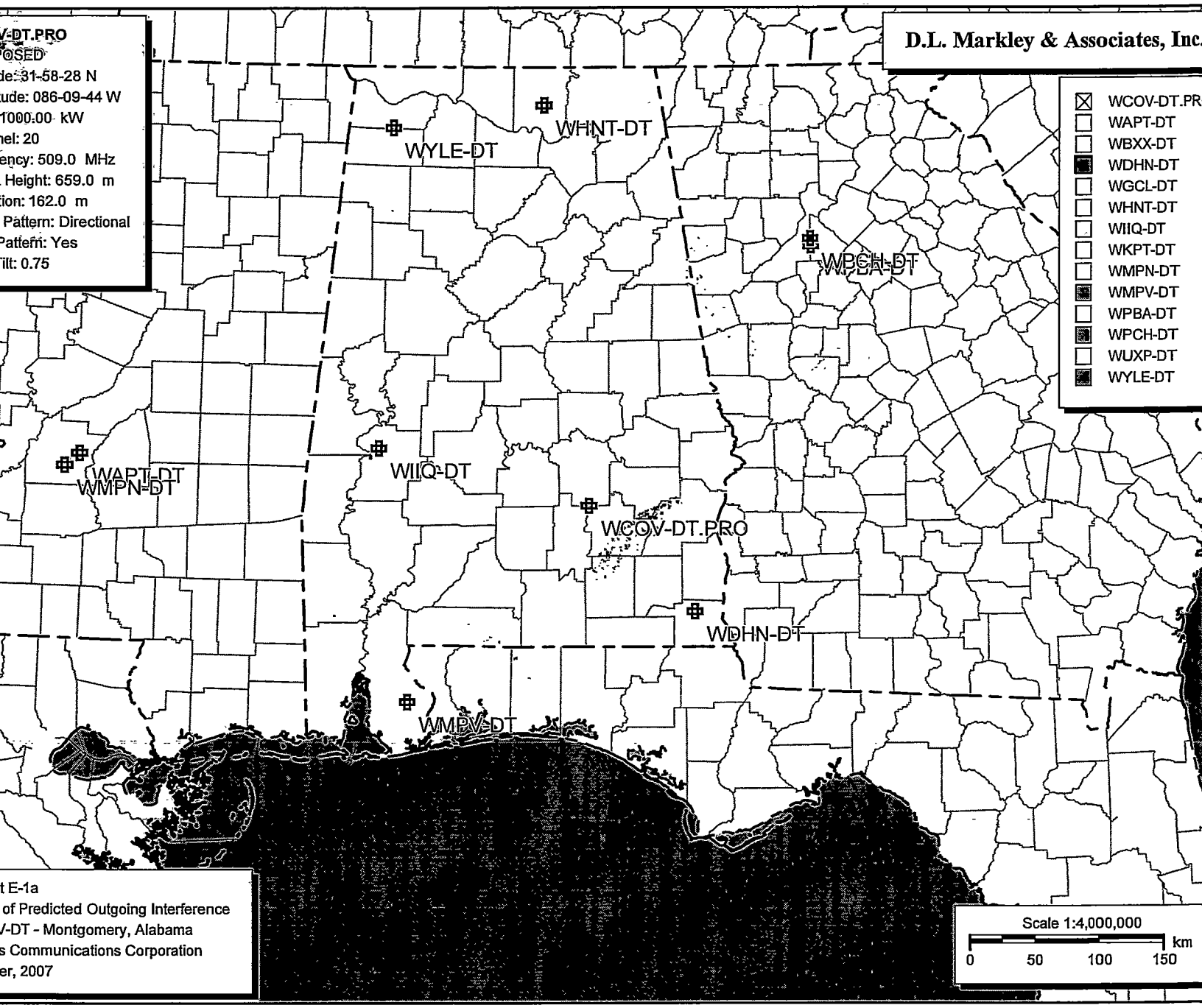
Following this first grouping of maps are two tabulations. These tabulations provide the population totals that would be predicted to receive interference from WCOV-DT operating on channel 20. Tabulations for population both under the 1990 Census and 2000 Census data have been included. As both of these tabulations demonstrate, the proposed facility would not cause more than 0.4 percent interference to any facility listed in the post-transition table of allotments. In addition, none of the facilities considered would receive interference to 10 percent or greater of its service population either inclusive or exclusive of WCOV-DT. The proposed change in the allotment for WCOV-DT from channel 16 to channel 20 would therefore comply with current Commission Rules and with expected changes to Commission Rules limiting interference to 0.5 percent.

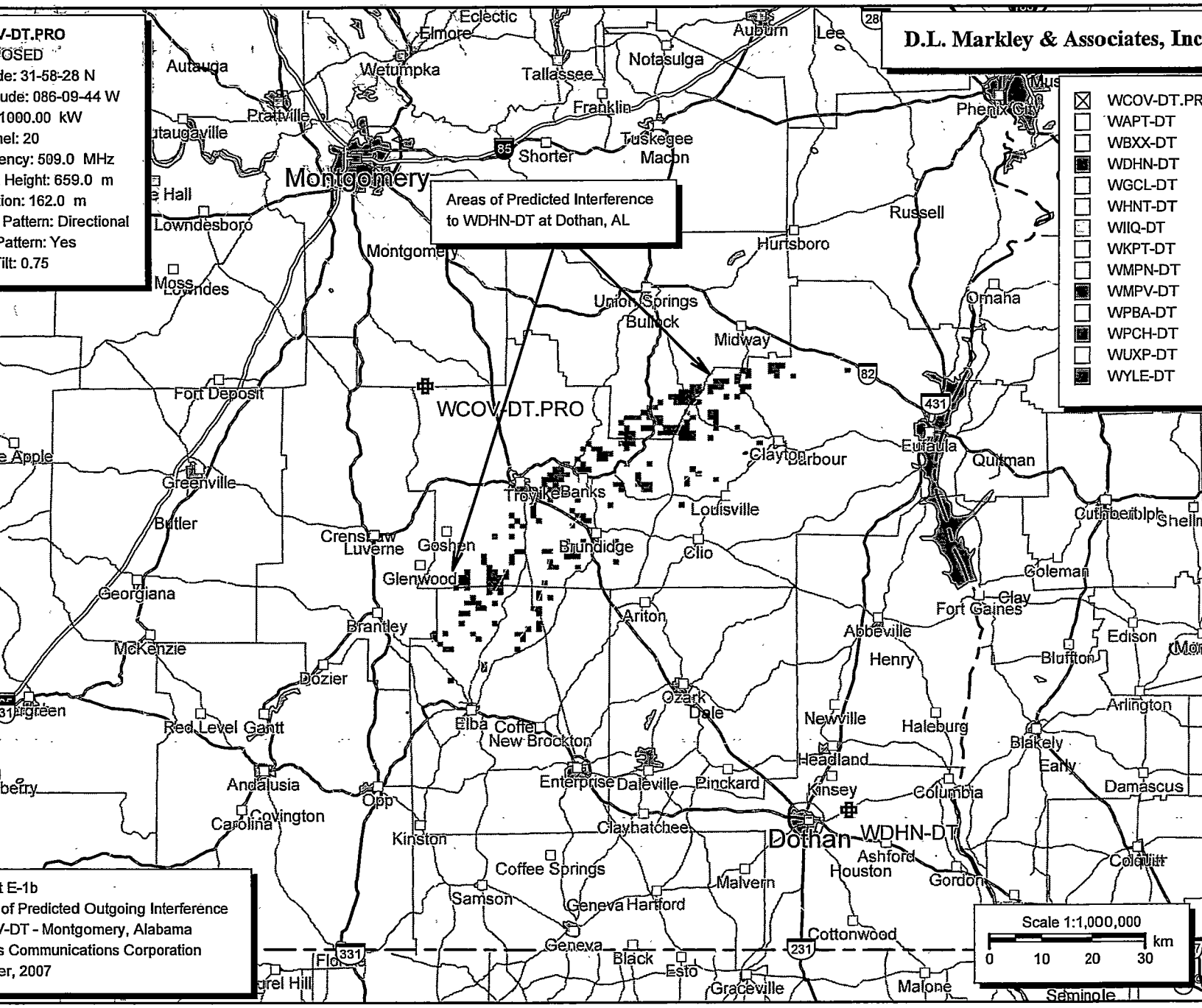
The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.



Above signature is digitized copy of actual signature

Jeremy D. Ruck
Consulting Engineer
October 22, 2007


V-DT.PRO
POSED
de: 31-58-28 N
tude: 086-09-44 W
1000.00 kW
nel: 20
ency: 509.0 MHz
Height: 659.0 m
tion: 162.0 m
Pattern: Directional
Pattern: Yes
Tilt: 0.75
D.L. Markley & Associates, Inc.
WCOV-DT.PR
WAPT-DT
WBXX-DT
WDHN-DT
WGCL-DT
WHNT-DT
WIIQ-DT
WKPT-DT
WMPN-DT
WMPV-DT
WPBA-DT
WPCH-DT
WUXP-DT
WYLE-DT
WHNT-DT
WYLE-DT
WPCH-DT
WAPT-DT
WMPN-DT
WIIQ-DT
WCOV-DT.PRO
WDHN-DT
WMPV-DT
t E-1a
of Predicted Outgoing Interference
V-DT - Montgomery, Alabama
s Communications Corporation
er, 2007
Scale 1:4,000,000
km
0
50
100
150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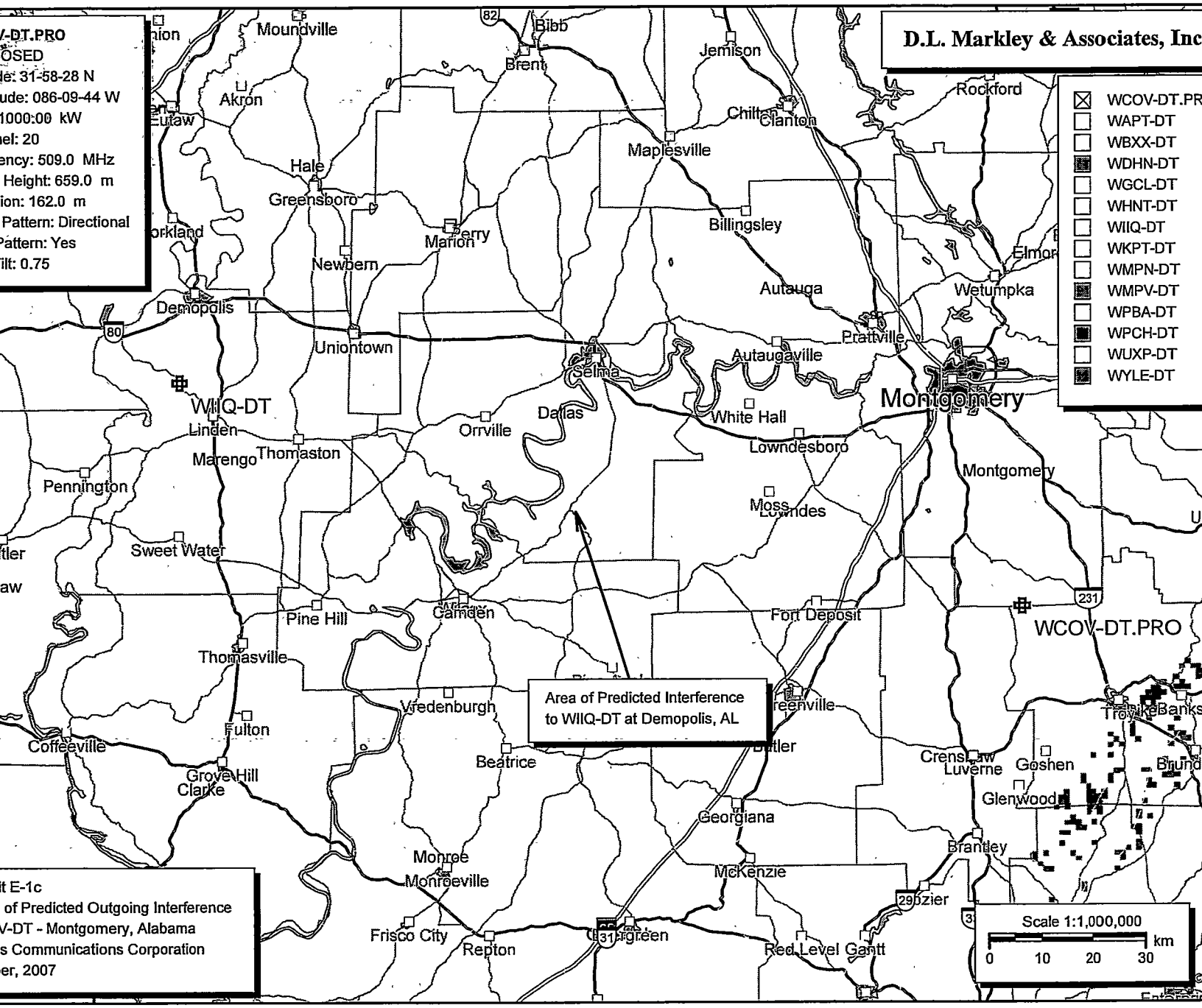
WHNT-DT
WIIQ-DT
WKPT-DT
WMPN-DT
WMPV-DT
WPBA-DT
WPCH-DT
WUXP-DT
WYLE-DT
Areas of Predicted Interference
to WDHN-DT at Dothan, AL
WCOV-DT.PRO
WDHN-DT
Montgomery
Dothan
Eclectic
Elmore
Auburn
Lee
Autauga
Wetumpka
Tallassee
Notasulga
Prattville
Franklin
Phenix City
Shorter
Tuskegee
Macon
Hall
Lowndesboro
Montgomery
Hurtsboro
Russell
Moss
Lowndes
Union Springs
Bullock
Omaha
Midway
Fort Deposit
Apple
Greenville
Clayton
Barbour
Eufaula
Quitman
Troy
Pike
Banks
Louisville
Butler
Crenshaw
Luverne
Goshen
Brundidge
Clio
Cuthbert
Shell
Glenwood
Georgiana
Coleman
Clay
Fort Gaines
Ariton
Brantley
Abbeville
Edison
McKenzie
Henry
Bluffton
Dozier
Ozark
Dale
Arlington
Red Level
Gantt
Elba
Coffee
New Brockton
Newville
Haleburg
Blakely
Early
Headland
Andalusia
Enterprise
Daleville
Pinckard
Kinsey
Columbia
Damascus
Opp
Covington
Carolina
Clayhatchee
Kinston
Ashford
Houston
Gordon
Coffee Springs
Malvern
Samson
Geneva
Hartford
Cottonwood
Geneva
Black
Esto
Graceville
Malone
Seminole
331
231
Scale 1:1,000,000
km
0
10
20
30
t E-1b
of Predicted Outgoing Interference
V-DT - Montgomery, Alabama
s Communications Corporation
er, 2007


D.L. Markley & Associates, Inc
V-DT.PRO
OSED
le: 31-58-28 N
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1000:00 kW
el: 20
ency: 509.0 MHz
Height: 659.0 m
ion: 162.0 m
Pattern: Directional
Pattern: Yes
ilt: 0.75
WCOV-DT.PR
WAPT-DT
WBXX-DT
WDHN-DT
WGCL-DT
WHNT-DT
WIIQ-DT
WKPT-DT
WMPN-DT
WMPV-DT
WPBA-DT
WPCH-DT
WUXP-DT
WYLE-DT
Moundville
Bibb
Brent
Jemison
Rockford
Akron
Chilton
Clanton
Maplesville
Hale
Greensboro
Billingsley
Marion
Newbern
Autauga
Wetumpka
Demopolis
Prattville
Uniontown
Autaugaville
Selma
Montgomery
WIIQ-DT
Linden
Orrville
Dallas
White Hall
Marengo
Thomaston
Lowndesboro
Pennington
Montgomery
Moss
Sweet Water
Pine Hill
Camden
Fort Deposit
WCOV-DT.PRO
Thomasville
Area of Predicted Interference
to WIIQ-DT at Demopolis, AL
Vredenburgh
Fulton
Coffeeville
Beatrice
Crenshaw
Luverne
Goshen
Grove Hill
Clarke
Glenwood
Georgiana
Brantley
Monroe
Monroeville
McKenzie
Frisco City
Repton
Red Level
Gantt
Scale 1:1,000,000
km
0 10 20 30
t E-1c
of Predicted Outgoing Interference
V-DT - Montgomery, Alabama
s Communications Corporation
er, 2007